

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Chapter 11

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),
et al.,

Case No. 02-12152 (CGC)

Debtors.

(Jointly Administered)

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),
et al.,

Plaintiffs,

03-A-54271

v.

Jaeban (U.K.) Limited, *et al.*,

Defendants.

REPLY AFFIDAVIT OF PHILLIP TAYLOR

I, PHILLIP TAYLOR, of 25 Basinghall Street, London EC2V 5HA,

hereby make oath and say:

1 I am qualified as a solicitor in England and Wales. I am
associated with Sidley Austin Brown & Wood and practise in the Firm's London office.

2 At Kenneth Wile's request, I assembled a team of associates
and trainee solicitors to review the contents of 84 boxes which I understand were
produced by Mr. Jaeban from Welcome House. According to the timekeeping records I
have reviewed, it took the team (along with myself and Mr. Wile) in aggregate more than

65 hours to review the contents of the boxes, catalogue such contents, and identify the most significant documents for Mr. Wile and I to review.

3 On August 4, 2004, in Birmingham, England, Mr. Jaeban's U.S. counsel, Robert Wilcox, informed Mr. Wile and I that Jaeban (U.K.) Limited had employed PriceWaterhouseCoopers ("PwC") to conduct the document review that apparently led to the production of documents to Budget Rent-a-Car International, Inc. ("BRACII") in November 2003. During that conversation, Mr. Wilcox informed Mr. Wile and I that PwC may have applied their own criteria as to relevance when selecting documents for production to BRACII.

Sworn before me:

CHARLOTTE BEESTON

Solicitor.



at: 25 BASING HALL STREET
LONDON EC2V 5HA

20/09/2004